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U.S. DISTRICT COURT

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**IN THE UNITED STATES DISTRICT COURT DISTRICT FOR
THE DISTRICT OF UTAH, CENTRAL DIVISION**

RUSSELL G. GREER,

Plaintiff

v.

JOSHUA MOON, publisher of the website
Kiwi Farms, **and KIWI FARMS**, a website

Defendants

**PLAINTIFF'S MOTION to EXTEND
TIME TO RESPOND TO DEFENDANTS**

Case No.: 2:20-cv-00647

Judge David Barlow
Magistrate Judge: Jared C. Bennett

Plaintiff Russell Greer comes forth pursuant to *FRCP 6(b)(1)(A)* and asks for a motion to extend time to reply.

FACTS

1. On Wednesday, January 17th, Defendants filed 4 documents: (1) an answer to the complaint, (2) a motion to strike, (3) a motion to change venue and (4) motion for joinder.
2. The following day, Thursday, January 18th, Defendants filed 3 more motions: (1) Motion to amend/correct, (2) Motion to Intervene and (3) Motion to Substitute Party.
3. Based on the Local Rules, Plaintiff would have until January 31st to respond to 3 of the motions filed on the 17th.
4. Plaintiff would then have to respond on February 1st to the motions filed on the 18th.
5. Then a week later, on the 7th, Plaintiff would have to Reply to Defendants' Answer.
6. In less than a month, that's 7 documents Plaintiff has to reply to.

FRCP RULE 6(B)(1)(A)

7. Under the Federal Rules of Civil Procedure 6(b)(1)(A), Plaintiff is allowed to file a motion for extension of time for good cause before the original time expires.

GOOD CAUSE EXISTS

8. Plaintiff respectfully asks this Court to extend the response deadlines because good cause exists.
9. Good cause exists because 7 documents from Defendants were thrown onto Plaintiff within a day of each other.
10. This slew of filings almost seems tactical and seems as if it was an attempt to bury Plaintiff, a pro se litigant, in paperwork and to cause him stress.
11. Truthfully, Plaintiff is consumed in a baggage of both personal and professional and therefore he would not be able to reply to all 7 documents in less than a month – a

majority of them due in 2 weeks — and not be able to give his best Responses to all 7 documents.

Dates Requested to Be Extended

12. Plaintiff respectfully asks that all filings be extended for a month.
13. For the filings due on 01-31-24 (the motion to strike, the motion to change venue and the motion for joinder), it would be requested that they be due by 02-29-24.
14. For the filings due on 02-01-24 (the motion to amend/correct, the Motion to Intervene and the Motion to Substitute Party), it would be requested that they be due by 03-01-24.
15. For the Reply to the Answer, due on 02-07-24, it would be requested that it be due by 03-07-24.

PRAYER FOR RELIEF

16. Plaintiff asks respectfully that the deadlines be extended.

DATED: January 19th, 2024

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to be 'R Greer', written over a horizontal line.

Russell Greer
Pro Se Litigant
/rgreer